

# UNITED STATES DISTRICT COURT

for the  
District of South Dakota

IN THE MATTER OF THE SEARCH OF )  
INFORMATION ASSOCIATED WITH )  
THE FOLLOWING SNAPCHAT )  
ACCOUNT: )  
Billsays605 )

Case No. 5:19-mj-67

THAT IS STORED AT PREMISES )  
CONTROLLED BY SNAPCHAT )

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

SEE "ATTACHMENT A" attached to and incorporated in this Application and Affidavit

located in the District of South Dakota, there is now concealed *(identify the person or describe the property to be seized)*:

SEE "ATTACHMENT B", which is attached to and incorporated in this Application and Affidavit

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

*Code Section*  
[18 U.S.C. § 2422(b)]

*Offense Description*  
[Enticement of a Minor Using the Internet]

The application is based on these facts:

- ☒ Continued on the attached affidavit, which is incorporated by reference.
- ☐ Delayed notice of \_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.
- ☐ Your applicant requests that no notice be given prior to the execution of the search warrant, i.e., "no knock", the basis of which is set forth in the attached affidavit.
- ☐ Your applicant requests authorization to serve the search warrant any time day or night pursuant to Fed. R. Crim. P. 41(e)(2)(A)(ii), the basis of which is set forth in the attached affidavit.

*L. Klein (for)*  
*Affiant Signature*

Sarah B. Collins, Assistant U.S. Attorney  
*Printed Name and Title*

Sworn to before me and: ☒ signed in my presence.

☐ submitted, attested to, and acknowledged by reliable electronic means.

Date: 6-24-19

*Daneta Wollmann*  
*Judge's signature*

City and state: Rapid City, SD

Daneta Wollmann, U.S. Magistrate  
*Printed name and title*

## UNITED STATES DISTRICT COURT

for the  
District of South DakotaIN THE MATTER OF THE SEARCH OF )  
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THAT IS STORED AT PREMISES )  
CONTROLLED BY SNAPCHAT )  
)

## SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the District of South Dakota (identify the person or describe the property to be searched and give its location):

See ATTACHMENT A, attached hereto and incorporated by reference

I find that the affidavit, or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal (identify the person or describe the property to be seized):

Evidence of a crime in violation of 18 U.S.C. § 2422(b), as described in ATTACHMENT B, attached hereto and incorporated by reference.

I find that the affidavit, or any recorded testimony, establishes probable cause to search and seize the person or property.

YOU ARE COMMANDED to execute this warrant on or before July 8, 2019 (not to exceed 14 days)☐ in the daytime 6:00 a.m. to 10 p.m. ☒ at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to Daneta Wollmann  
(United States Magistrate Judge)

☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box)

☐ for \_\_\_\_\_ days (not to exceed 30).☐ until, the facts justifying, the later specific date of \_\_\_\_\_.

☐ I find that good cause has been established to authorize the officer executing this warrant to not provide notice prior to the execution of the search warrant, i.e., "no knock".

Date and time issued: 6-24-19 8:45am

Judge's signature

City and state: Rapid City, SDDaneta Wollmann, U.S. Magistrate

Printed name and title

cc: AUSACollins  
no 2 + Agent

**Return**

Case No.:

5:19-mj-67

Date and time warrant executed:

Copy of warrant and inventory left with:

Inventory made in the presence of :

Inventory of the property taken and name of any person(s) seized:

**Certification**

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Executing officer's signature*\_\_\_\_\_  
*Printed name and title*

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
WESTERN DIVISION

IN THE MATTER OF THE SEARCH OF  
INFORMATION ASSOCIATED WITH THE  
FOLLOWING SNAPCHAT ACCOUNT:

Billsays605

THAT IS STORED AT PREMISES CONTROLLED  
BY SNAPCHAT

5:19-mj-67

Filed Under Seal  
REDACTED

AMENDED

**AFFIDAVIT IN SUPPORT OF**  
**AN APPLICATION FOR A SEARCH WARRANT**

State of South Dakota    )  
                                      ) ss  
County of Pennington    )

I, John Barnes, being duly sworn, state as follows:

1. I am a Special Agent with the South Dakota Division of Criminal Investigation and have been so employed since August of 2014. During that time, I have attended the South Dakota Division of Criminal Investigation 13-week basic law enforcement-training academy and then completed the 10-week field training. I have also attended the one-week DCI crime scene training in Pierre, SD, the DEA Clandestine Laboratory Investigation/Safety Certification Program in Quantico, VA, the MCTC Science Based Drug Education course, the National Guard Counterdrug Aviation Policy course, the NTOA Advanced Crisis Negotiations course, the Basic Data Recovery and Acquisition course, and the Intermediate Data Recovery and Analysis Course. I attended Black Hills State University and graduated with a Bachelor's Degree in Business Administration with a specialization in Accounting. Currently, I am assigned to the ICAC Task Force (Internet Crimes against Children). The investigations worked by this unit include child pornography, solicitation of minors, sexual exploitation of minors,

disseminating harmful materials to minors, and human trafficking. I have investigated and assisted in the investigation of cases involving the possession, receipt, and distribution of child pornography in violation of federal law to include 18 U.S.C. § 2422(b), enticement of a minor using the internet. During my law enforcement-career, I have become familiar with the *modus operandi* of persons who engage in enticement of minors using the internet. Based on my experience and training, I am knowledgeable of the various means utilized by individuals who exploit children on the internet.

2. I have investigated and assisted in the investigation of cases involving the enticement of minors using the internet in violation of federal law to include violations of United States Statutes 18 U.S.C. § 2422(b). During my law enforcement-career, I have become familiar with the *modus operandi* of persons involved in the enticement of minors using the internet. Based on my experience and training, I am knowledgeable of the various means utilized by individuals who exploit children utilizing the internet.

3. I have been informed that 18 U.S.C. § 2422(b) makes it a crime for a person to use the internet or any other means, which affects interstate commerce, to attempt to knowingly persuade, induce, entice, and coerce a person who has not attained the age of 18 years to be caused to engage in a criminal sex act.

4. I make this affidavit in support of an application for a search warrant for information associated with a certain Snapchat user that is stored at premises owned, maintained, controlled, or operated by Snapchat, a social

networking company headquartered in Venice, California. The information to be searched is described in the following paragraphs and in Attachments A and B.

5. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Snapchat to disclose to the government records and other information in its possession, pertaining to the subscriber or customer associated with the user IDs.

6. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that evidence of violations of 18 U.S.C. § 2422(b), are present in the following Snapchat account: Billsays605. There is also probable cause to search the information described in Attachment A for evidence, contraband, or fruits of these crimes, as further described in Attachment B.

#### **PROBABLE CAUSE**

7. On 2/20/19, I received a Cybertip (45691614) from the National Center of Missing and Exploited Children (NCMEC). I downloaded the information provided in the Cybertip and placed it on a CD. I also received the content listed in the Cybertip, along with the images that were supplied. A summary of the information is listed below:

#### **Submitter:**

Skout.com  
The Meet Group Legal Team  
100 Union Square Drive  
New Hope, PA 18938 US

#### **Executive Summary:**

"The following is a brief overview of information contained in this CyberTipline report: This report was submitted by the ESP Skout concerning Online Enticement and Unconfirmed Child Pornography. It appears the child victim claims to be 11 years old. It appears the suspect claims to be 45 years old. It

appears the suspect and child victim engage in sexually explicit conversation. It appears the suspect entices the child victim to send sexually explicit images."

#### **Incident Information**

Incident Type: Child Pornography (possession, manufacture, and distribution)  
Incident Time: 01-17-2019 20:35:41 UTC

#### **Child Victim**

Name: [REDACTED]  
Email Address: [REDACTED]@gmail.com  
ESP User ID: 142349380  
IP Address: 174.255.6.119 (Login)

#### **User or Person Being Reported**

Name: will  
Email Address: williamsanders816@yahoo.com  
ESP User ID: 141016550  
IP Address: 96.3.35.98 (Login)

8. The Cybertip provided the content of communication between [REDACTED] ("S") and williamsanders816@yahoo.com ("Sanders"). Sanders was later identified as John Carl Sanders. [REDACTED] is 11 years old and lives in Rapid City. During the conversation, [REDACTED] had Sanders guess her age. She said she was below 18 and when Sanders guessed 11, she responded with yes. Sanders told [REDACTED] that he was "45". Below are the messages provided in the Cybertip:

2018-12-22 20:03:35 <[REDACTED]@gmail.com>: Wyd  
2018-12-22 20:03:24 <[REDACTED]@gmail.com>: Hey  
2018-12-22 19:59:44 <williamsanders816@yahoo.com>: Hey  
2018-12-22 19:20:24 <williamsanders816@yahoo.com>: Hey  
2018-12-22 15:49:33 <[REDACTED]@gmail.com>: Hey  
2018-12-22 15:49:27 <[REDACTED]@gmail.com>: Hey  
2018-12-22 03:47:51 <williamsanders816@yahoo.com>: Hi  
2018-12-22 03:20:55 <williamsanders816@yahoo.com>: Hey

2018-12-21 22:17:58 <williamsanders816@yahoo.com>: Hey

2018-12-21 21:06:21 <williamsanders816@yahoo.com>: In a bit ive got it just  
got add you

2018-12-21 19:10:34 <[REDACTED]@gmail.com>: Hey

2018-12-21 18:41:06 <[REDACTED]@gmail.com>: Do you have it

2018-12-21 18:36:47 <[REDACTED]@gmail.com>: When are you going to  
get it

2018-12-21 18:34:30 <williamsanders816@yahoo.com>: Not yet

2018-12-21 18:22:08 <[REDACTED]@gmail.com>: Did u

2018-12-21 18:21:15 <[REDACTED]@gmail.com>: Babe did you

2018-12-21 18:21:07 <[REDACTED]@gmail.com>: Did u add me

2018-12-21 18:15:50 <williamsanders816@yahoo.com>: Ok

2018-12-21 18:15:13 <[REDACTED]@gmail.com>: My Skout is  
[REDACTED]

2018-12-21 18:15:00 <[REDACTED]@gmail.com>: I do

2018-12-21 18:14:53 <williamsanders816@yahoo.com>: Get snapchat

2018-12-21 18:14:36 <[REDACTED]@gmail.com>: So what do we do now

2018-12-21 18:12:14 <[REDACTED]@gmail.com>: No

2018-12-21 18:11:36 <williamsanders816@yahoo.com>: Do you have Snapchat

2018-12-21 18:08:28 <williamsanders816@yahoo.com>: Do the ps let you go  
play

2018-12-21 18:05:24 <[REDACTED]@gmail.com>: Oh ok

2018-12-21 18:05:15 <williamsanders816@yahoo.com>: Got to be safe

2018-12-21 18:04:30 <[REDACTED]@gmail.com>: User sent picture

2018-12-21 18:04:00 <[REDACTED]@gmail.com>: Why

2018-12-21 18:03:49 <williamsanders816@yahoo.com>: Show me a picture of  
your school book

2018-12-21 18:03:27 <[REDACTED]@gmail.com>: No

2018-12-21 18:03:25 <[REDACTED]@gmail.com>: Bo

2018-12-21 18:03:23 <[REDACTED]@gmail.com>: Bot

2018-12-21 18:02:58 <williamsanders816@yahoo.com>: I got to ask are you a  
cop

2018-12-21 18:02:37 <williamsanders816@yahoo.com>: Ya

2018-12-21 17:56:31 <[REDACTED]@gmail.com>: Do you like it

2018-12-21 17:55:25 <[REDACTED]@gmail.com>: Hey

2018-12-21 17:21:06 <williamsanders816@yahoo.com>: Hey

2018-12-21 16:55:24 <[REDACTED]@gmail.com>: User sent picture

2018-12-21 16:54:57 <[REDACTED]@gmail.com>: User sent picture

2018-12-21 16:49:37 <[REDACTED]@gmail.com>: Babe

2018-12-21 16:49:36 <[REDACTED]@gmail.com>: Hey abe

2018-12-21 16:47:14 <[REDACTED]@gmail.com>: Hey

2018-12-21 15:03:07 <williamsanders816@yahoo.com>: Morning cutie

2018-12-21 05:26:40 <williamsanders816@yahoo.com>: Hi

2018-12-21 03:52:51 <williamsanders816@yahoo.com>: Yes ttyl

2018-12-21 03:52:34 <[REDACTED]@gmail.com>: Lick my pussey

2018-12-21 03:52:25 <[REDACTED]@gmail.com>: Bye sexiest

2018-12-21 03:52:15 <williamsanders816@yahoo.com>: Bye cutie lyl

2018-12-21 03:51:56 <[REDACTED]@gmail.com>: Love you cutie

2018-12-21 03:51:22 <williamsanders816@yahoo.com>: Okay talk to you later

2018-12-21 03:51:12 <[REDACTED]@gmail.com>: Bye

2018-12-21 03:51:10 <[REDACTED]@gmail.com>: Bc my mom said

2018-12-21 03:50:46 <williamsanders816@yahoo.com>: Why do you have to go

2018-12-21 03:50:34 <[REDACTED]@gmail.com>: Well I have to go bye

2018-12-21 03:49:45 <[REDACTED]@gmail.com>: Ya

2018-12-21 03:49:25 <williamsanders816@yahoo.com>: So you are a virgin

2018-12-21 03:49:00 <[REDACTED]@gmail.com>: Straight

2018-12-21 03:48:47 <williamsanders816@yahoo.com>: So you are a straight virgin

2018-12-21 03:48:32 <[REDACTED]@gmail.com>: Noooo

2018-12-21 03:48:10 <williamsanders816@yahoo.com>: Ok have you started your period Yet

2018-12-21 03:47:39 <[REDACTED]@gmail.com>: Just u

2018-12-21 03:47:38 <[REDACTED]@gmail.com>: None

2018-12-21 03:47:08 <williamsanders816@yahoo.com>: How many guys have you been with

2018-12-21 03:47:05 <williamsanders816@yahoo.com>: User sent picture

2018-12-21 03:46:49 <[REDACTED]@gmail.com>: Show me your dick

2018-12-21 03:46:21 <williamsanders816@yahoo.com>: I bet

2018-12-21 03:46:09 <[REDACTED]@gmail.com>: I love old men like u

2018-12-21 03:46:04 <williamsanders816@yahoo.com>: Ya

2018-12-21 03:45:58 <[REDACTED]@gmail.com>: 45

2018-12-21 03:45:37 <williamsanders816@yahoo.com>: Old

2018-12-21 03:45:16 <[REDACTED]@gmail.com>: How old are u

2018-12-21 03:45:04 <williamsanders816@yahoo.com>: Yep

2018-12-21 03:44:58 <[REDACTED]@gmail.com>: Lick my pussey

2018-12-21 03:44:27 <williamsanders816@yahoo.com>: Ya 2

2018-12-21 03:44:07 <[REDACTED]@gmail.com>: Ya love u so much

2018-12-21 03:43:18 <williamsanders816@yahoo.com>: W(Y)(Y)

2018-12-21 03:42:32 <[REDACTED]@gmail.com>: Love it let have sex

2018-12-21 03:42:08 <williamsanders816@yahoo.com>: User sent picture

2018-12-21 03:41:42 <[REDACTED]@gmail.com>: User sent picture

2018-12-21 03:41:12 <[REDACTED]@gmail.com>: User sent picture

2018-12-21 03:41:02 <williamsanders816@yahoo.com>: Wow

2018-12-21 03:40:39 <[REDACTED]@gmail.com>: User sent picture

2018-12-21 03:40:26 <williamsanders816@yahoo.com>: Can you spread them pussy lips wide and give me a close up

2018-12-21 03:40:04 <[REDACTED]@gmail.com>: Thank

2018-12-21 03:39:57 <williamsanders816@yahoo.com>: Love that pussy

2018-12-21 03:39:35 <[REDACTED]@gmail.com>: Lol love it

2018-12-21 03:39:28 <williamsanders816@yahoo.com>: User sent picture

2018-12-21 03:36:30 <[REDACTED]@gmail.com>: User sent picture

2018-12-21 03:36:00 <[REDACTED]@gmail.com>: Hey sorry

2018-12-21 03:07:01 <williamsanders816@yahoo.com>: When u want hit me up send more pics

2018-12-21 02:03:39 <williamsanders816@yahoo.com>: Why u not talking any more

2018-12-21 01:51:54 <williamsanders816@yahoo.com>: Hello

2018-12-21 01:49:32 <williamsanders816@yahoo.com>: Where do you live

2018-12-21 01:47:58 <[REDACTED]@gmail.com>: Idk

2018-12-21 01:47:18 <williamsanders816@yahoo.com>: How would we meet ??  
How would u get away from parents.??

2018-12-21 01:44:59 <[REDACTED]@gmail.com>: Oh what do u mean

2018-12-21 01:44:40 <williamsanders816@yahoo.com>: I like you but I don't like cops

2018-12-21 01:43:53 <[REDACTED]@gmail.com>: You like me or love me

2018-12-21 01:43:39 <williamsanders816@yahoo.com>: Yes yes

2018-12-21 01:37:15 <[REDACTED]@gmail.com>: Do u like me

2018-12-21 01:31:27 <[REDACTED]@gmail.com>: No text me on here and why did you say well

2018-12-21 01:29:31 <williamsanders816@yahoo.com>: Text me 6058369113

2018-12-21 01:27:35 <[REDACTED]@gmail.com>: Why did you say well

2018-12-21 01:27:21 <[REDACTED]@gmail.com>: Well what

2018-12-21 01:25:51 <williamsanders816@yahoo.com>: Nice

2018-12-21 01:23:56 <williamsanders816@yahoo.com>: Oh my god

2018-12-21 01:23:02 <[REDACTED]@gmail.com>: Well what

2018-12-21 01:20:38 <[REDACTED]@gmail.com>: So do you

2018-12-21 01:19:36 <[REDACTED]@gmail.com>: User sent picture

2018-12-21 01:18:44 <[REDACTED]@gmail.com>: Well what

2018-12-21 01:18:31 <williamsanders816@yahoo.com>: Well

2018-12-21 01:18:09 <[REDACTED]@gmail.com>: Do u

2018-12-21 01:17:23 <[REDACTED]@gmail.com>: But don't you like  
poeple 18 or up

2018-12-21 01:16:12 <williamsanders816@yahoo.com>: Ok yea

2018-12-21 01:14:58 <[REDACTED]@gmail.com>: Do u like it

2018-12-21 01:13:33 <[REDACTED]@gmail.com>: User sent picture

2018-12-21 01:07:43 <[REDACTED]@gmail.com>: Hey

2018-12-21 01:06:21 <[REDACTED]@gmail.com>: Ya but you are in to 18  
year old and no younger

2018-12-21 01:05:30 <williamsanders816@yahoo.com>: Oh ok

2018-12-21 01:05:11 <[REDACTED]@gmail.com>: Have sex no fuck

2018-12-21 01:04:55 <williamsanders816@yahoo.com>: Fuck so one whats  
that meen

2018-12-21 01:04:16 <[REDACTED]@gmail.com>: And chat

2018-12-21 01:04:10 <[REDACTED]@gmail.com>: Fuck so one

2018-12-21 01:04:00 <williamsanders816@yahoo.com>: What u want to do

2018-12-21 01:03:04 <[REDACTED]@gmail.com>: So what

2018-12-21 01:01:19 <[REDACTED]@gmail.com>: Cool

2018-12-21 01:01:15 <[REDACTED]@gmail.com>: Oh ok cooo

2018-12-21 01:01:01 <williamsanders816@yahoo.com>: Looking for chat , friends on up to relationships

2018-12-21 01:00:15 <[REDACTED]@gmail.com>: Too

2018-12-21 01:00:14 <[REDACTED]@gmail.com>: Why do you have this app

2018-12-21 00:59:55 <williamsanders816@yahoo.com>: Ok so what do u want to do with a bf

2018-12-21 00:59:13 <[REDACTED]@gmail.com>: Lol

2018-12-21 00:59:07 <williamsanders816@yahoo.com>: User sent picture

2018-12-21 00:58:47 <[REDACTED]@gmail.com>: User sent picture

2018-12-21 00:57:59 <williamsanders816@yahoo.com>: Your first finger and middle finger in a v

2018-12-21 00:57:22 <[REDACTED]@gmail.com>: User sent picture

2018-12-21 00:56:39 <[REDACTED]@gmail.com>: Idk how to put the peace enjoy on my face

2018-12-21 00:56:13 <[REDACTED]@gmail.com>: Oh ok

2018-12-21 00:56:04 <williamsanders816@yahoo.com>: To where i know u are real

2018-12-21 00:55:13 <[REDACTED]@gmail.com>: Why

2018-12-21 00:55:00 <williamsanders816@yahoo.com>: Send me a selfie with the peace symbol in front of your face

2018-12-21 00:54:01 <[REDACTED]@gmail.com>: U

2018-12-21 00:53:48 <[REDACTED]@gmail.com>: A boyfriend

2018-12-21 00:53:40 <williamsanders816@yahoo.com>: So what r u looking for on here

2018-12-21 00:53:28 <[REDACTED]@gmail.com>: Ya

2018-12-21 00:53:13 <williamsanders816@yahoo.com>: Ok

2018-12-21 00:53:07 <[REDACTED]@gmail.com>: Yes

2018-12-21 00:53:03 <williamsanders816@yahoo.com>: 11

2018-12-21 00:52:59 <[REDACTED]@gmail.com>: Lower

2018-12-21 00:52:53 <williamsanders816@yahoo.com>: 12

2018-12-21 00:52:40 <[REDACTED]@gmail.com>: Lower

2018-12-21 00:51:47 <williamsanders816@yahoo.com>: 13

2018-12-21 00:51:27 <[REDACTED]@gmail.com>: Below 18

2018-12-21 00:51:17 <[REDACTED]@gmail.com>: I'm.....

2018-12-21 00:50:32 <[REDACTED]@gmail.com>: Oh well I'm not that old  
and you will date a 18 year old gril and you are 45

2018-12-21 00:49:40 <williamsanders816@yahoo.com>: 18

2018-12-21 00:49:20 <[REDACTED]@gmail.com>: How old do you want  
your girl friend to be

2018-12-21 00:48:51 <williamsanders816@yahoo.com>: How old i guessed  
three times

2018-12-21 00:48:32 <[REDACTED]@gmail.com>: No how old would you  
like to date

2018-12-21 00:48:04 <williamsanders816@yahoo.com>: 14

2018-12-21 00:47:34 <[REDACTED]@gmail.com>: One

2018-12-21 00:47:26 <[REDACTED]@gmail.com>: On more

2018-12-21 00:47:07 <williamsanders816@yahoo.com>: 13

2018-12-21 00:46:37 <[REDACTED]@gmail.com>: What do u think

2018-12-21 00:45:44 <[REDACTED]@gmail.com>: Two more guess

2018-12-21 00:45:27 <williamsanders816@yahoo.com>: 15

2018-12-21 00:45:15 <[REDACTED]@gmail.com>: Guess

2018-12-21 00:44:49 <[REDACTED]@gmail.com>: I'm.....

2018-12-21 00:44:41 <williamsanders816@yahoo.com>: 18 or older

2018-12-21 00:44:28 <[REDACTED]@gmail.com>: So are you going to

2018-12-21 00:42:31 <[REDACTED]@gmail.com>: Ya you would frist  
answer my question

2018-12-21 00:42:07 <williamsanders816@yahoo.com>: Just tell me i wont  
block u

2018-12-21 00:42:00 <[REDACTED]@gmail.com>: Old

2018-12-21 00:41:55 <[REDACTED]@gmail.com>: How ols

2018-12-21 00:40:43 <[REDACTED]@gmail.com>: How old do you want  
me to be how old do you how old do you want yourgirlfriend to be

2018-12-21 00:39:49 <williamsanders816@yahoo.com>: Cuz id like to know

2018-12-21 00:39:28 <[REDACTED]@gmail.com>: Why

2018-12-21 00:39:19 <williamsanders816@yahoo.com>: And what are you  
looking for on this site

2018-12-21 00:38:42 <williamsanders816@yahoo.com>: Tell the truth

2018-12-20 23:34:44 <[REDACTED]@gmail.com>: How old do you want  
me to be

2018-12-20 23:29:53 <[REDACTED]@gmail.com>: Not that old I know you  
are going to block me when I tell you so ya

2018-12-20 15:06:28 <williamsanders816@yahoo.com>: So how old are you

2018-12-20 00:40:02 <[REDACTED]@gmail.com>: Hey

2018-12-19 11:55:23 <williamsanders816@yahoo.com>: 45

2018-12-19 05:38:06 <[REDACTED]@gmail.com>: How old are u

2018-12-19 05:30:41 <williamsanders816@yahoo.com>: How are you ?? How  
old are you

2018-12-19 05:22:56 <[REDACTED]@gmail.com>: Hi

2018-12-19 05:19:39 <williamsanders816@yahoo.com>: Hi

9. Although the Cybertip stated there was only one uploaded file, it contained 15 images. The file was a zipped file that was labeled: 141016550\_142349380.zip. The following describes the images I observed in the Cybertip:

Filename: a3.jpg

This image is of a male whose penis is exposed with pubic hair. There appears to be a black article of clothing behind the penis, possibly underwear. It should be noted that when John Sanders was interviewed on 2/27/19, he admitted to sending pictures of his penis.

Filename: a4.jpg

This image is of a male whose penis is ejaculating on a black article of clothing, possibly underwear. It should be noted that when John Sanders was interviewed on 2/27/19, he admitted to sending pictures of his penis.

Filename: a8.jpg

This image appears to be the same image as a3.jpg

Filename: a12.jpg

This image is of an individual whose left breast is exposed with the nipple visible. The breast appears to have hair on it. The individual is holding up two fingers in a "peace sign." The individual's face is not visible in the image. It should be noted that when John Sanders was interviewed on 2/27/19, he admitted to sending this picture.

Filename: b0.jpg

This image is of what appears to be a bedroom with a pink book bag on the floor. The pink book bag has a purple folder in the bag. The carpet is green and there is a white dresser and vacuum in the image.

Filename: b1.jpg

This image is of a female whose underwear is not visible in the image. Her vagina and anus are exposed, and she is laying on what appears to be a yellow bed sheet. She is wearing a grey shirt and only a small portion of her mouth is exposed. I am unable to determine the age or who the female this is at this point.

Filename: b2.jpg

This image is of a female's vagina taken from about her waistline. This is a close up image of her vagina and her legs are open. I am unable to determine the age or who the female this is at this point.

Filename: b5.jpg

This image is of a female whose vagina is exposed. It appears that the device used to take the picture is laying on the floor and the girl is standing above the device with no pants or underwear on. Her vagina is exposed, and she appears to have on a grey shirt. The walls in the bathroom are of wood siding and are in the background of multiple images provided in the Cybertip. There is also a white object on the ceiling that appears to be either a light or a heater. I am unable to determine at this time what the object is. I believe this to be an image of ██████████ (11 years old), this is based on comparing this image to other images where her face is clearly visible.

Filename: b6.jpg:

This image is of a female with her vagina exposed. This female has one finger on each side of vagina and appears to be spreading her vagina open. The female is wearing a grey shirt. In this image, you can see a small portion of the same light/heater that is noted in image "b5". I believe this to be an image of ██████████ based on comparing it to other images where her face is clearly visible.

Filename: b7.jpg

This image is of a female who vagina is exposed. It appears that this female is taking the picture with a device that is right below her vagina. The female is wearing a grey shirt. I believe this to be an image of ██████████ based on comparing it to other images where her face is clearly visible.

Filename: b9.jpg

I believe this image is of ██████████ and she is completely nude and is sitting on the floor of a bathroom. One breast is completely exposed, and her other breast is partially covered by her right wrist. Both her vagina and anus are exposed. In the image, she has her right index finger right in front of her vagina. This image appears to have the same wood siding in the background as other images provided in the Cybertip.

Filename: b10.jpg

This image is of [REDACTED] and she is standing nude in front of what appears to be a mirror. Her breasts and vagina are exposed in this image. This image appears to have the same wood siding in the background as other images provided in the Cybertip.

Filename: b11.jpg

This image is of a female buttocks and the female is wearing a grey shirt. The female is not wearing any underwear, but the vagina cannot be clearly seen due to the shadow in the image. This image appears have the same wood siding in the background and the light/heater as in other images provided in the Cybertip. I believe this to be an image of [REDACTED] based on comparing to other images where her face is clearly visible.

Filename: b13.jpg

This image is of [REDACTED] and she is holding up two fingers in front of her face as if she is making the "peace sign". She is wearing a grey tank top in this image and had watch appears to be red paint on her hand. There is no nudity in this image.

Filename: b14.jpg

This image is of [REDACTED] as if she is taking a "Selfie" photograph. She is wearing a grey tank top in this image. There is no nudity in this image.

10. I contacted South Middle School Resource Office Nick Strampe, and he provided me with a school picture of [REDACTED] from their data system. I used this image as a comparison photograph in the images that showed her face.

11. The 15 images described above were the ones provided in the Cybertip. Below are the fifteen times an image was sent in the Skout message between [REDACTED] and Sanders. These are directly from the Skout messages.

- a. 2018-12-21 18:04:30 <[REDACTED]@gmail.com>: User sent picture
- b. 2018-12-21 16:55:24 <[REDACTED]@gmail.com>: User sent picture
- c. 2018-12-21 16:54:57 <[REDACTED]@gmail.com>: User sent picture
- d. 2018-12-21 03:47:05 <williamsanders816@yahoo.com>: User sent picture
- e. 2018-12-21 03:42:08 <williamsanders816@yahoo.com>: User sent picture
- f. 2018-12-21 03:41:42 <[REDACTED]@gmail.com>: User sent picture
- g. 2018-12-21 03:41:12 <[REDACTED]@gmail.com>: User sent picture

- h. 2018-12-21 03:40:39 <[REDACTED]@gmail.com>: User sent picture
- i. 2018-12-21 03:39:28 <williamsanders816@yahoo.com>: User sent picture
- j. 2018-12-21 03:36:30 <[REDACTED]@gmail.com>: User sent picture
- k. 2018-12-21 01:19:36 <[REDACTED]@gmail.com>: User sent picture
- l. 2018-12-21 01:13:33 <[REDACTED]@gmail.com>: User sent picture
- m. 2018-12-21 00:59:07 <williamsanders816@yahoo.com>: User sent picture
- n. 2018-12-21 00:58:47 <[REDACTED]@gmail.com>: User sent picture
- o. 2018-12-21 00:57:22 <[REDACTED]@gmail.com>: User sent picture

12. The Cybertip also provided the following:

Adult User Profile:

- Adult information
- Adult id: 141016550
- Adult email: williamsanders816@yahoo.com
- Adult username: williamsanders816@yahoo.com
- Adult age: 45
- Adult birthdate: 1973-[REDACTED] 00:00:00
- Adult created: 2018-11-13 05:59:51
- Adult last seen: 2018-12-25 16:53:44

13. Skout provided multiple IP addresses regarding the login history of this individual. I was able to determine these IP addresses are leased/owned by the following companies: MidContinent Communication, Vast, and AT&T.

14. The Cybertip also provided the following:

Minor User Profile:

- Minor information
- Minor id: 142349380
- Minor email: [REDACTED]@gmail.com
- Minor username: [REDACTED]@gmail.com
- Minor age: 31
- Minor birthdate: 1987-05-06 00:00:00
- Minor created: 2018-12-19 04:21:42
- Minor last seen: 2018-12-22 19:46:27

15. Skout provided multiple IP addresses regarding the login history of this individual. I was able to determine that these IP addresses are leased/owned by Verizon Wireless.

16. I sent a preservation request to SnapChat, Inc. regarding the SnapChat user account of [REDACTED]. I sent this to SnapChat because [REDACTED] provided this username to Sanders during the Skout chats. SnapChat, Inc contacted me and informed me that they received the preservation and assigned it Case #38150748.

17. I sent a preservation request to Google, Inc. regarding the Google email account of [REDACTED]@gmail.com. Google, Inc. contacted and informed me they had received the preservation request and assigned it Google Reference. No. 2338421.

18. I sent a preservation request to Yahoo regarding the email account of williamsanders816@yahoo.com. That evening, a legal analyst from their law enforcement response team contacted me and informed me that the user account specified in the request is not a valid Yahoo email address or Yahoo ID at this time.

19. On 2/21/19, I sent a preservation request to Skout, Inc. regarding the two user accounts listed in their submitted Cybertip.

20. On 2/21/19, I sent a subpoena to Midcontinent Communications requesting subscriber information regarding the IP addresses and time frames provided by Skout, Inc.:

96.3.35.98 From 11/13/2018 through 12/25/2018

24.111.154.224 11/26/2018 through 11/27/2018

21. That same day, I received the subpoena results from Midcontinent Communications with the following information:

IP address 96.3.35.98 Results:

Acct Nbr: 7031910-13

MICHELLE SANDERS

[REDACTED]

BOX ELDER SD 57719-9436

Home Phone: 9136050228

Business Phone: NONE

SSN#: [REDACTED] 5407 Driver License: NONE

Status: A Status Date: 20180226 Install Date: 20170921

Connect Date: 20180226

IP Address 24.111.154.224

Acct Nbr: 1412202-01

BLACK HILLS MEDICAL BUILDING

677 CATHEDRAL DR

RAPID CITY SD 57701-6018

Business Phone: 6057168467

22. On 2/21/19, I sent a subpoena to AT&T Internet Services requesting subscriber information regarding multiple IP addresses and times that were provided in the Skout Cybertip. On 2/23/19, I received the subpoena results from AT&T informing me that they are unable to provide any information in response to legal demand because AT&T does not maintain records in normal course of business that associate individual accounts or devices with wireless

dynamic IP addresses. They also informed me that these blocks of IP addresses are used by AT&T Wireless for internet access and web base applications for wireless devices (such as web enabled cell phones and air cards).

23. On 2/21/19, I sent a subpoena to Clarity Telecom, DBA VAST Broadband requesting subscriber information regarding an IP address at different times that were provided in the Skout Cybertip. On 2/22/19, I received the following subpoena results from Clarity Telecom:

Customer information:

Acct Nbr 82583-01

Status A ACTV 2/04/15

HOLIDAY INN EXPRESS

645 E DISK DR

RAPID CITY, SD 57701-7812

605-348-8719

605-355-9090

jacqueo@tkohotels.com

Last 4 of SSN given on account is 8111

Information provided:

"In response to your subpoena request, 208.117.96.228 is an IP from our pool of static IPs for fiber internet customers. We have assigned a subnet, 208.117.96.224/27 for Holiday Inn Express in Rapid City. The IPs within that subnet, including .228, are assigned at the customer's discretion on their own equipment. Vast can only verify that the subnet was assigned to the customer during the timeframe requested." For complete details, refer to the subpoena results.

24. The adult user profile information that was provided with the Cybertip showed that the individual's age was 45 and a birthdate of 1973- [REDACTED]. It should be noted that during the messages, Sanders told [REDACTED] that he

was 45 years old. I searched the Rapid City Police Department records systems for a "William Sanders" and did not find one. I then conducted a search for individuals with the last name Sanders who are 45 years old. During this search, I found John C Sanders with a DOB of 1973-██████. According to the records system, his address is ██████████ in Box Elder, SD. John Sanders is listed as a registered sex offender.

25. I contacted Sex offender Compliance Officer Joleen Ollerich and she informed me that John Sanders moved here from Missouri and that he is currently on parole with Parole Officer Jack Gray. I contacted Parole Officer Jack Gray and he confirmed that the address he has list for John Sanders is ██████████ ██████████ Box Elder, SD. Gray informed me that the phone number he has listed for Sanders is 605-863-5843. Gray told me that Michelle Sanders is John's wife and that John works at the Holiday Inn Express off Catron Blvd. on the south side of town.

26. On 2/21/19, I sent a subpoena to Midcontinent Communications requesting subscriber information regarding two IP addresses that Skout provided in the Cybertip. I was informed that IP address 96.3.35.98 belongs to Michelle Sanders with an address of ██████████ Box Elder, SD. The Skout user account (Williamsanders816@yahoo.com) was created at this IP address, the account was accessed many times from this IP address, and this was the last IP address used to login to the account. This IP address was used each day of the conversation between the account "William Sanders" and ██████████ ██████████ The only other IP addresses used during this time are owned/leased by AT&T and which are likely linked to a cellular device using cellular data.

27. On 2/22/19, I looked up John Sanders' phone number (605) 863-5843) provided by his Parole Officer, Jack Gray. I determined that this phone number is registered to Cricket Wireless and that AT&T owns Cricket Wireless.

28. On 2/21/19, I sent a subpoena to Clarity Telecom, DBA VAST Broadband requesting subscriber information regarding an IP address that was provided in the Skout Cybertip. I was informed that the IP address of 208.117.96.228 belongs to Holiday Inn Express (645 E Disk Dr, Rapid City, SD). They informed me that they assigned a subnet, 208.117.96.224/27 for Holiday Inn Express in Rapid City. The IPs within that subnet, including .228, are assigned at the customer's discretion on their own equipment. Again, Parole Office Jack Gray informed me that John Sanders works at Holiday Inn Express.

29. On 2/25/2019, US Magistrate Judge Daneta Wollmann signed and approved a federal search warrant for the property located at [REDACTED] Box Elder, SD, the residence of John and Michelle Sanders.

30. On 2/27/19, law enforcement officers of the ICAC task force executed the search warrant at John and Michelle Sander's residence. Det. Harding and I interviewed John Sanders while other agents executed the search warrant. During the interview, Sanders admitted it was he communicating with the 11-year-old juvenile female. Sanders confirmed that he knew she was 11-years-old and that included him requesting images from her. I read the following message from the Skout conversation to Sanders, "Can you spread them pussy lips wide and give me a close up?" I asked Sander's if that was him and he said, "yes." Sanders admitted that it was his penis in the pictures sent to this 11-year-

old juvenile female. Sanders also wrote an apology letter to the parents of this juvenile female.

31. After the interview, Sanders was transported to the Pennington County Jail by a Box Elder PD Officer. Sanders was detained on a parole-hold at the discretion of his Parole Officer, Jack Gray.

32. On 2/28/19, [REDACTED] was forensically interviewed at the Child Advocacy Center. [REDACTED] did not disclose about the contact with John Sanders on Skout. When the interviewer suggested they take a break, [REDACTED] asked to see her mother. [REDACTED] then became emotional and the interview was ended at that time.

33. After the interview I spoke with [REDACTED]'s mother, Amber Morin. I showed Amber the image, "bO.jpg" that was provided the Cybertip. Amber informed me that was from their old residence in Custer and that is her daughter's book bag located in the picture. She informed me that they moved from this residence on 12/28/18. It should be noted that the conversations between John Sanders and [REDACTED] took place 12/19/18 through 12/22/18. Amber also informed me that the bathroom at this residence had wood siding that made it look like a log cabin, like that in the photos.

34. It should be noted that during the interview with John Sanders on 2/27/19, he provided us his SnapChat user name. Sanders told us that his SnapChat user name is "Billsays605". Sanders informed me that he had sent her a "Snap" also known as a message. Sanders told us that he sent her one and then blocked her. On 2/28/19, I sent a preservation request to SnapChat, Inc regarding the account, "Billsays605," the SUBJECT ACCOUNT. Using an

Undercover SnapChat account I was able to find this account on SnapChat and took a screen shot of it.

### **INFORMATION ON SNAPCHAT**

35. Based on my training and experience and what I have learned through other sources, I know the following:

- a. Snapchat, Inc. is headquartered at 63 Market Street, Venice, California.
- b. Snapchat is a messaging application whereby users can take photos or records videos and send them to recipients. These messages are known as "Snaps." The following additional information regarding Snapchat is from a Snapchat, Inc. document entitled, "Snapchat Law Enforcement Guide", which indicates it was last updated in June, 2017:

Snaps: A user takes a photo or video using their camera phone in real-time. The user then selects a time limit of 1-10 seconds for the receiver to view the photo or video. A user can elect to have the photo/video saved in their phone's photo gallery or just sent via Snapchat, without being saved. The photo/video can then be sent to a friend in Snapchat.

Stories: A user can also add the photo/video Snap to their "Story". Depending on the user's privacy settings, the photos and videos added to a Story can be viewed by either all Snapchatters or just the user's friends for up to 24 hours.

Chat: A user can also type messages to friends within the Snapchat app using the Chat feature. A user sends a Chat message to a friend, and once it is viewed by both parties – and both parties swipe away from the Chat screen – the message will be cleared. Within the Snapchat app itself, a user can opt to save part of the Chat by tapping on the message (text or photo) that he or she wants to keep. The user can clear the message by tapping it again.

Memories: Memories is Snapchat's cloud-storage service. Users can save their sent or unsent Snaps, posted Stories, and photos and videos from their phone's photo gallery in Memories. A user can also edit and send Snaps and create Stories from these Memories. Snaps, Stories, and other photos and

videos saved in Memories are backed up by Snapchat and may remain in Memories until deleted by the user.

36. If there are snaps that have not been viewed, the content of the snap is still retained until the intended party has viewed the snap. I have also been advised by a representative of Snapchat, that there is the possibility of some Snapchat information may be able to provide geolocation data, recorded when the user uploads items to Snapchat.

37. In addition to photos, videos, "Snaps" and stories, "Snapcash" is an online money transfer service offered by Snapchat. The actual business platform is run by "SquareUp", the distributor of a mobile credit card reader and application Square Register. Snapcash can be used to transfer money between Snapchat users using a linked, U.S. issued Visa or MasterCard debit card only; using credit cards is not permitted. Snapcash can only be sent to other users who have a linked debit card. Snapcash has a \$250 weekly limit but can be upgraded to a \$2,500 weekly limit. Users who upgrade have to provide their full name, date of birth, and Social Security number.

38. While a Snapchat message may disappear, the record of who sent it and when still exists. Snapchat records and retains information that is roughly analogous to the call detail records maintained by telecommunications companies. This includes the date, time, sender, and recipient of a snap. Additionally, Snapchat stores the number of messages exchanged, which users they communicate with the most, message status including if and when the message was opened, and whether the receiver used the native screen capture function of their device to take a picture of the snap before it disappeared.

39. Snapchat asks users to provide basic contact and personal

identifying information to include date of birth. When a user creates an account they make a unique Snapchat username. This is the name visible to other Snapchat users. An email address is required to register a Snapchat account and a new user must also provide a mobile phone number. This phone number is verified during the registration process. Snapchat sends an activation code, which must be entered before proceeding with the registration step. However, a user may elect to bypass entering a phone number so one may not always be present in the user's account. Snapchat also retains the account creation date.

40. Snapchat stores device information such as the model, operating system, operating system version, mobile device phone number, and mobile network information of devices used in conjunction with the service. They also collect unique device identifiers such as the Media Access Control (MAC) address and the International Mobile Equipment Identifier (IMEI) or Mobile Equipment Identifier (MEID) of devices used to access Snapchat. In the event the Snapchat user's application crashes, the company also collects a list of other installed applications on the device to detect any potential software conflicts.

**INFORMATION TO BE SEARCHED**  
**AND THINGS TO BE SEIZED**

41. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Snapchat to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-

authorized persons will review that information to locate the items described in Section II of Attachment B.

**REQUEST/JUSTIFICATION FOR**  
**ORDER OF NONDISCLOSURE**

42. The United States respectfully applies for an order of nondisclosure to Snapchat under 18 U.S.C. § 2705(b) regarding the following account: Billsays605. The United States is seeking this search warrant for user information, including all names, addresses, IP addresses, including historical, telephone numbers, other email addresses, information on length and types of services and any means of payment related to these accounts under the authority given by 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A). Based on § 2703(c)(3), the United States is not required to provide notice to the subscriber. Under § 2705(b), the United States may apply to the court for an order commanding Snapchat not to notify the subscriber of the existence of the search warrant. The court may decide what length of time shall apply to the order of nondisclosure if the court determines the notification to the subscriber could result in one of the five factors listed in the statute, which includes destruction of or tampering with evidence. 18 U.S.C. § 2705(b)(3). The basis for the request is that such disclosure could cause any person with access to the accounts, or any related account or account information, to tamper with or modify the content or account information and thereby destroy or tamper with evidence and otherwise seriously jeopardize the investigation. Especially due to the ease of access to Snapchat, its content can be modified by persons with internet access and sufficient account information. As such, the United States

respectfully requests this Court enter an order commanding Snapchat not to notify the user of the existence of this warrant.

**REQUEST FOR SEALING**

43. I further request that the Court order that the matter be sealed until further order of the Court. The matter is an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal the matter because premature disclosure may seriously jeopardize the ongoing investigation.

**LIMIT ON SCOPE OF SEARCH**

44. I submit that if during the search, agents find evidence of crimes not set forth in this affidavit, another agent or I will seek a separate warrant.

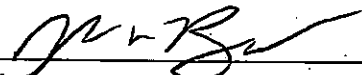
**CONCLUSION**

45. Based on the forgoing, I request that the Court issue the proposed search warrant.

46. This Court has jurisdiction to issue the requested warrant because it is "a court of competent jurisdiction" as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A).

47. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant.

Dated: 6/24/19

  
Special Agent John W. Barnes  
South Dakota DCI/SD ICAC

SUBSCRIBED and SWORN to  
du in my presence  
by reliable electronic means  
this 24<sup>th</sup> day of June, 2019.

  
DANETA WOLLMANN, U.S. MAGISTRATE JUDGE

**ATTACHMENT A**

**Property to Be Searched**

This warrant applies to information associated with the following Snapchat user IDs that are stored at premises owned, maintained, controlled, or operated by Snapchat, a company headquartered in Venice, California:

- User Name: Billsays605

## ATTACHMENT B

### Particular Things to be Seized

#### I. Information to be disclosed by Snapchat

To the extent that the information described in Attachment A is within the possession, custody, or control of Snapchat, including any messages, records, files, logs, or information that have been deleted but are still available to Snapchat, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Snapchat is required to disclose the following information to the government for each user ID listed in Attachment A:

- (a) All stored communications and other files in your possession (to include, if available, account access information, event histories including dates and times, connection dates, times and locations, connection IP information, message content, graphics files, attachments, etc., further detailed below), whether physical, stored on electronic media, or temporarily extant on any computer or server, reflecting communications to or from Snapchat Account **"Billsays605"**.
- (b) All files that have been created and/or accessed via Snapchat Account **"Billsays605"**.
- (c) The identifiers and all available information for any other email account(s) associated with Snapchat Account **"Billsays605"**.
- (d) All connection logs and records of user message activity, including;

- 1) Transmitter/Sender identifier (i.e. addresses and/or IP address);
  - 2) Connection date and time;
  - 3) Method of connection (telnet, ftp, http);
  - 4) Data transfer volume;
  - 5) User name associated with the connection and other connection information, including the Internet Protocol address of the source of the connection;
  - 6) Other user accounts associated with, referenced in or accessed by Snapchat Account "**Billsays605**".
  - 7) Address books, contact lists and "my friends," if available;
  - 8) Records of files or system attributes accessed, modified, or added by the user.
- (e) All records and other evidence relating to the subscriber(s), customer(s), account holder(s), or other entity(ies) associated with Snapchat Account "**Billsays605**", including, without limitation, subscriber names, user names, screen names or other identities, addresses, residential addresses, business addresses, and other contact information, telephone numbers or other subscriber number or identifier number, billing records, information about the length of service and the types of services the subscriber or customer utilized, and any other identifying information, whether such records or other evidence are in electronic or

other form. Such records and other evidence include, without limitation, correspondence and other records of contact by any person or entity about the above-referenced account, the content associated with or relating to postings, communications and any other activities to or through Snapchat Account **"Billsays605"** whether such records or other evidence are in electronic or other form.

- (f) All records pertaining to communications between Snapchat and any person regarding the user or the user's Snapchat account, including contacts with support services and records of actions taken.

**II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. § 2422(b), enticement of a minor using the internet, from December 1, 2018, to present, including, for each user IDs identified on Attachment A.

**III. Information Regarding Search Warrant Compliance by Snapchat:**

Snapchat shall disclose responsive data, if any, by sending to:

Special Agent John Barnes  
Internet Crimes Against Children Taskforce  
300 Kansas City Street, Suite 200  
Rapid City, SD 57701  
John.Barnes@state.sd.us  
(605) 377-7420

Snapchat shall use the United States Postal Service or another courier service to disclose the responsive data, notwithstanding 18 U.S.C. § 2252A or similar statute or code.

**CERTIFICATE OF AUTHENTICITY OF DOMESTIC BUSINESS  
RECORDS PURSUANT TO FEDERAL RULE OF EVIDENCE 902(11)  
& (13)**

I, \_\_\_\_\_, attest, under penalties of perjury under the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this declaration is true and correct. I am employed by Snapchat, and my official title is \_\_\_\_\_. I am a custodian of records for Snapchat. I state that each of the records attached hereto is the original record or a true duplicate of the original record in the custody of Snapchat, and that I am the custodian of the attached records consisting of \_\_\_\_\_ (pages/CDs/kilobytes). I further state that:

- a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth, by, or from information transmitted by, a person with knowledge of those matters;
- b. such records were kept in the ordinary course of a regularly conducted business activity of Snapchat; and
- c. such records were made by Snapchat as a regular practice.

I further state that this certification is intended to satisfy Rules 902(11) and (13) of the Federal Rules of Evidence.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature